

Alfredo J. Pelicci  
[apelicci@filippatoslaw.com](mailto:apelicci@filippatoslaw.com)  
 212-202-0234, Ext. 402  
 Admitted: DC, FL, MD, NY, VA



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December 18, 2024

**VIA ECF**

Hon. Judge Analisa Torres  
 United States District Court Southern District of New York  
 500 Pearl Street  
 New York, NY 10007

Re: *Delancey v. FOX Corporation et al*, Case No. 1:23-cv-10357 (AT)

Dear Judge Torres:

Pursuant to the Court's Individual Practices in Civil Cases, Section I(C), Plaintiff Andrew Delancey moves the court for a forty-five-day extension of all remaining deadlines set forth in the Case Management Plan (Dkt. No. 47), as set out in the attached Amended Case Management Plan (Ex. A) and below:

	<b>Original Deadline</b>	<b>Proposed Deadline</b>
Close of Fact Discovery	January 26, 2025	March 12, 2025
Deposition Deadline	January 5, 2025	February 19, 2025
Expert Discovery Deadline	March 12, 2025	April 26, 2025

This is the second request for an extension of the discovery deadlines in this matter. Defendants Justin Wells, Fox News Network, LLC and Fox Corporation take no position with respect to this request. Plaintiff seeks this request as Plaintiff's counsel that was handling the day-to-day aspects of this matter unexpectedly needed to go on family leave and remains on such leave. Plaintiff's other counsel has suffered health issues and was impacted by two hurricanes in September and October 2024, one of which required Plaintiff's counsel to evacuate his family to another state. As such, the Parties' progress on narrowing discovery disputes has been impacted.

The brief extension sought by Plaintiff will enable the Parties to further narrow disputes before raising any unresolved disputes with the Court. The Parties held a meet and confer on December 11, 2024 and have another meet and confer scheduled for December 19, 2024. Additionally, the Parties are in the process of scheduling depositions in this matter.

We thank Your Honor for your time and consideration.

GRANTED. Depositions shall be completed by **February 19, 2025**. Fact discovery shall close on **March 12, 2025**. On **April 26, 2025**, expert discovery shall close. Additionally, the case management conference currently scheduled for February 18, 2025, is ADJOURNED to **April 7, 2025**, at **10:00 a.m.**

SO ORDERED.

Dated: December 30, 2024  
 New York, New York

  
 ANALISA TORRES  
 United States District Judge